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## III. Remarks

## A. IDS

Per the Examiner's request, Applicants have reviewed the art cited to the Patent Office to highlight those documents which Applicants consider to be of the most significance. Initially, the Applicants would like to state that Applicants are aware of their duty of disclosure under MPEP 2004 to the Patent Office. Applicants would like to apologize if its perhaps over inclusive submissions caused any extra work for the Examiner. Please know that Applicants had no intention of "burying" any references contrary to the spirit of the *Penn Yan Boats* decision cited by the Examiner and, if anything, made their submissions in an effort to ensure that it withheld no information that possibly may have been relevant and which Applicants and its attorneys had in their possession.

From the art cited by Applicants, Applicants would like to highlight the following references for their description of insulation manufacturing systems:

1. 2,785,728 (Reference AJ submitted 3/30/04);
2. 4,263,007 (Reference AQ submitted 3/30/04);
3. 4,316,865 (Reference AR submitted 3/30/04);
4. 4,756,945 (Reference AW submitted 3/30/04);
5. 4,835,045 (Reference AX submitted 3/30/04);
6. 5,065,478 (Reference BE submitted 3/30/04);
7. 5,246,653 (Reference BF submitted 3/30/04);
8. 5,642,601 (Reference BN submitted 3/30/04);
9. "Glass Fiber Manufacturing" (Reference CJ submitted 3/30/04);
10. 4,067,678 (Reference B submitted 1/14/05); and
11. 4,310,585 (Reference C submitted 1/14/05).

Please note that Documents 10 and 11 were submitted in the January 14, 2005 IDS, which has not yet been considered by the Examiner.

Applicants hope that this response conforms with the Examiner's request. If not, the Examiner is invited to contact the undersigned to resolve any remaining issues.

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[I-8766]**B. Request for Information**

The Action includes a "Requirement for Information" setting forth nine question for the Applicants. These questions are listed below along with their respective responses. Applicants trust that this response meets the Examiner's request.

Question 1: The trade name of any goods or services the claimed subject matter is embodied.

Answer 1: The subject matter is neither a good nor a service, but rather a manufacturing system and method. Notwithstanding this fact, Applicants submit that the manufacturing system has not yet been built or used.

Question 2: The citation for the dates initially published and copies of any advertising and promotional literature prepared for any goods or services the claimed subject matter has been embodied.

Answer 2: See Answer 1. To the best of Applicants' knowledge, none exist.

Question 3: The citation for and copies of any journal articles describing any goods or services the claimed subject matter has been embodied.

Answer 3: See Answer 1. To the best of Applicants' knowledge, none exist.

Question 4: The trade names and providers of any goods or services in competition with the goods or services the claimed subject matter has been embodied.

Answer 4: See Answer 1. Applicants state further that Owens-Corning and Johns Manville are its major competitors in the manufacturing of insulation products.

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Question 5: Any written descriptions or analyses, prepared by any of the inventors or assignees, of goods or services in competition with the goods or services the claimed subject matter has been embodied.

Answer 5: See Answer 1. To the best of Applicants' knowledge, none exist.

Question 6: Identification of pending or abandoned applications filed by at least one of the inventors or assigned to the same assignee as the current application that disclose similar subject matter that are not otherwise identified in the current application.

Answer 6: To the best of Applicants' knowledge, no other applications exist as requested relating to "curing oven towers."

Question 7: An explanation of technical material in a publication, such as one of the inventor's publication.

Answer 7: Applicants are not clear to what "technical information" the Examiner refers, but to the extent that the technical information relates to "curing of towers," to the best of Applicants' knowledge, none exist.

Question 8: Publication dates of an undated document mentioned by applicant that may qualify as printed publication prior art (35 U.S.C. 102(a) or (b)).

Answer 8: To the best of Applicants' knowledge, Applicants have not mentioned any undated documents relating to "curing oven towers."

Question 9: Comments on information of record which raises a question of whether applicant derived the invention from another under 35 U.S.C. 102(f).

Answer 9: To the best of Applicants' knowledge, Applicants did not derive the invention from another and have no comments on any information of record, if any, pertaining to the same.

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[I-8766]**C. Rejection under 35 U.S.C. §102****1. Claims 1-7**

The Action rejects Claims 1-7 as being anticipated by U.S. Patent No. 3,060,589 to Wallin.

Claim 1 has been amended to recite that the curing oven tower also includes "a conveyor system comprising a plurality of pairs of counter-rotating conveyors disposed to move said mat through said plurality of vertical oven zones for curing, said mat being disposed between said counter-rotating conveyors." This amendment recites that the curing oven includes a specific kind of conveyor system where the uncured or partially cured mat is disposed between the counter-rotating conveyors and moved through the vertical oven zones for curing.

Claims 2, 5 and 6 have been canceled. Claim 3 has been amended consistent with the amendments to Claim 1.

Wallin discloses a system in FIG. 1 for drying granular materials. It is believed that the granular material moves through the system by means of gravity and the "treating medium," i.e., blown air. (Column 3, Lines 27-52). Wallin does not disclose or suggest an insulation manufacturing system (a) having a curing oven tower for heating an uncured or partially cured insulation mat, (b) a conveyor system comprising counter-rotating conveyors for moving the insulation mat through the vertical oven zones, or (c) where an insulation mat is disposed between counter-rotating conveyors.

For at least these reasons, it is submitted that Claim 1 is not anticipated by the cited reference and is allowable. Claims 3, 4 and 7 depend from Claim 1 and are also allowable. Reconsideration and withdrawal of this rejection are respectfully requested.

**2. Claims 8-9 and 11-15**

The Action rejects Claims 8-9 and 11-15 as being anticipated by U.S. Patent No. 4,047,985 to Axer. As an initial matter, Applicants would like to note that Claims 11-13 depend

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from Claim 10, which is not rejected as being anticipated by Axer. Withdrawal of the anticipation rejection of Claims 11-13, therefore, is respectfully requested.

Claim 8 has been amended to recite that the moving step includes the step of moving the insulation mat through the plurality of vertical oven zones for curing, i.e., the mat must at least be moved vertically to pass through the plurality of "vertical oven zones." Claim 9 has been canceled. Claims 10, 12, 13 and 15 have been amended consistent with the amendments to Claim 8.

The Examiner did not cite to any specific portion of Axer as disclosing the plurality of vertical oven zones or the moving step. Applicants believe that the Examiner may have been relying on the press 15 of Axer shown in FIG. 2. Press 15 includes a plurality of heated platens 20 that each receives a separate pre-cut mat "S". Once each area has a mat "S", Applicants believe the press 15, as indicated by the arrows in FIG. 2, then closes to compress the mats "S" for final curing of the individual mats. (Column 3, Line 55-Column 4, Lines 7).

It is clear that each individual mat is horizontally fed into a respective section of the press, and then, after final cure, ejected. Therefore, Axer does not teach the step of "moving the insulation mat through the plurality of vertical oven zones for curing." Put another way, each mat in the system of Axer is only moved through a single oven zone in press 15. Accordingly, it is submitted that Claim 8, and the claims that depend therefrom, are not anticipated by and are allowable over the cited reference.

### 3. Claims 16-18 and 20

The Action rejects Claims 16-18 and 20 as being anticipated by Smith, Jr.

Claim 16 has been amended to recite that the insulation mat is a fiberglass insulation mat, and to correct "mats" to read "mat." Claim 16 has also been amended to recite that the conveyor system includes "cooperable pairs of counter-rotating conveyors." Claims 17-19 have been canceled.

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Smith, Jr. describes a system for heating sheet materials, such as continuous sheet of paper or metal sheets, for evaporating volatile chemicals. The system uses a system of rollers 254 (FIG. 14) for pulling the sheet material through the system. The sheet material must be initially pre-threaded through the apparatus over all rollers 254 (a-e), and out through the opening 257. (Column 10, Lines 41-44).

It is submitted that the roller/pulley system of Smith, Jr. would not be appropriate for conveying insulation mats in manufacturing system. Notwithstanding the fact that such pre-threading would be highly impractical (if not impossible), the insulation mat likely would not have sufficient dexterity until cured (and maybe not even then) for such pre-threading. Still further, it is clear that Smith, Jr. does not teach or suggest "cooperable pairs of counter-rotating conveyors" for moving an insulation mat. Rollers 254 of Smith, Jr. are not arranged in pairs and necessarily rotate in the same direction.

For at least these reasons, it is submitted that Claim 16 and the claims that depend therefrom are not anticipated by the cited reference and are allowable. Reconsiderations and withdrawal of this rejection are respectfully requested.

**D. Claim Rejection under 35 U.S.C. §103**

The Action rejects Claim 10 as being obvious over Axer in view of Wallin. Claim 10 depends from Claim 1 and is, accordingly, allowable for at least the reasons set forth above in connection with Claim 1.

The Action rejects Claims 19 and 21 as being obvious over Smith, Jr. in view of Wallin. Claim 19 has been canceled. Claim 21 depends from Claim 16, and is, accordingly, allowable for at least the reasons set forth above in connection with Claim 16.

The Action also rejects Claim 22-29 as being obvious from U.S. Patent No. 3,144,376 to Plumberg et al. in view of Wallin.

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Claims 22-25 and 28 have been amended to correct "mats" to read "mat." Independent Claim 22 is directed to a method of curing insulation comprising the step of moving an uncured or partially cured insulation mat both horizontally and vertically in a serpentine path through a curing oven tower comprising a heat source.

The Examiner concludes that it would have been obvious to combine the teachings of the references to achieve Applicants claimed method to minimize treatment area and overall size. It is respectfully submitted that there is no reasonable expectation of success in such a combination, and that any teaching or suggestion to modify Plumberg as suggested by the Examiner impermissibly relies, in hindsight, on the Applicants' disclosure.

Plumberg et al. discloses a conventional insulation mat manufacturing system, such as Applicants described in their "Background of the Invention" section of the present application. The system includes a purely horizontal curing oven 23 shown in FIG. 1. As Applicants explained above, Wallin provides a system for drying granulate loose materials. The system moves the granulates in a generally zigzag direction, but relies on gravity and blown air to move the granulates material.

It is important that Applicants claim a method of curing an insulation mat and the corresponding step of moving the insulation mat in the recited manner. Insulation mats are not loose granulates and form a fibrous web before curing. This web takes on an increasingly more robust form as it moves through the curing process. A gravity based/blown conveying method as described in Wallin may be appropriate for moving loose granulates that are being dried and not cured into a final structure. However, such a system would simply not work for curing an insulation mat. Wallin, therefore, would not teach one of ordinary skill how to modify a conventional system such as disclosed in Plumberg to move an uncured or partially cured **insulation mat** both horizontally and vertically in a serpentine path through a curing oven tower. Simply, the combination of the two systems would not achieve Applicants' claimed method, and, it is submitted, any such suggestion or motivation to combine the general teachings of the two

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references to achieve Applicants' claimed invention impermissibly relies on Applicants' disclosure.

Therefore, it is submitted that Claim 22 is not obvious from and is allowable over the cited references. Claims 23-29 depend from Claim 22 and, it is submitted, are also allowable. Reconsideration and withdrawal of this rejections are respectfully requested.



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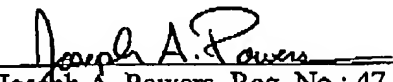
## IV. Conclusion

In view of the foregoing remarks and amendments, Applicant(s) submit that this application is in condition for allowance at an early date, which action is earnestly solicited.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account 04-1679.

Respectfully submitted,

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